

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

UNITED STATES OF AMERICA

v.

KLEIN TYLER CARTER

)
) Criminal Case No. *0:22cr00018*
)
) In violation of:
)
) 18 U.S.C. §§ 922(o)
) 21 U.S.C. §§ 841(a)(1), (b)(1)(C) and 846
)
)
)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Conspiracy to Distribute and Possess With Intent to Distribute Cocaine, Oxycodone, and Marijuana

1. Beginning at an unknown time, but by at least February 2022, and continuing through in or about April 2022, in the Western District of Virginia, and elsewhere, the defendant, KLEIN TYLER CARTER, did knowingly and intentionally combine, conspire, confederate, and agree with other persons known and unknown to the Grand Jury, to commit the following offenses against the United States: to distribute and possess with the intent to distribute cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance, oxycodone, a Schedule II controlled substance, and marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. All in violation of Title 21, United States Code, Sections 846, and 841(b)(1)(C).

COUNT TWO

Possession with the Intent to Distribute of Controlled Substances

3. On or about April 26, 2022, in the Western District of Virginia, KLEIN TYLER CARTER, knowingly and intentionally possessed with the intent to distribute cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance, and marijuana, a Schedule I controlled substance.

4. All in violation of Title 21, United States Code, Sections 841(a) and (b)(1)(C).

COUNT THREE

Illegal Possession of a Machinegun

5. On or about April 26, 2022, in the Western District of Virginia, the defendant, KLEIN TYLER CARTER, did knowingly possess a machinegun, that is a Glock, Model 19, 9mm pistol fitted with a machinegun conversion device.

6. All in violation of Title 18, United States Code, Sections 922(o)(1) and 924(a)(2).

COUNT FOUR

Possession of a Firearm by a Prohibited Person

7. On or about April 26, 2022, in the Western District of Virginia, the defendant, KLEIN TYLER CARTER, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearms, that is, a Taurus, Model G2C, 9mm pistol and a Glock, Model 19, 9mm pistol fitted with a machinegun conversion device, said firearms having been shipped and transported in interstate commerce.

8. All in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

9. Upon conviction of the offenses alleged in Count One, the defendant shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of this

offense; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of these offenses. The property subject to forfeiture includes:

- a. \$10,015 in United States currency seized from 2815 Candler's Mountain Road, Room 318, Lynchburg, Virginia on or about April 26, 2022;

The United States will seek a forfeiture money judgment against the defendant in the amount equal to the value of any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of these offenses.

10. Upon conviction of the offense alleged in Counts Three through Four, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in or used in the knowing commission of the offense, including but not limited to:

- a. a Taurus, Model G2C, 9mm pistol, with serial number ACJ2211738; and
- b. a Glock, Model 19, 9mm pistol, fitted with a machinegun conversion device, with serial number LCK246.

11. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

the defendants shall forfeit to the United States any other property of the defendant, up to the value of the property described above, pursuant to Title 21, United States Code, Section 853(p).

12. Criminal Forfeiture, pursuant to Title 18, United States Code, Section 924(d), Title 21, United States Code, Sections 853(a) and (p), and Title 28, United States Code, Section 246.

A TRUE BILL, this 11 day of August 2022.

s/foreperson
FOREPERSON


CHRISTOPHER R. KAVANAUGH
UNITED STATES ATTORNEY